

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT Greeneville.

**FILED**

FEB 28 2018

Clerk, U. S. District Court  
Eastern District of Tennessee  
At Greeneville

William Barwick Potter )

)

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)

)

Name of plaintiff )

v. )

)

Takoma Regional Hospital )

)

)

)

Name of defendant )

COMPLAINT

Case No. 2:18-cv-23

Mattice Corker

1. Grounds for filing this case in federal court.

TN Code 16-15-501 Allows this Court General Jurisdiction.

This Case is Filed under T.C.A Code 29-26-121 Also known as Medical Malpractice.

2. Plaintiff, William Barwick Potter resides at

510 Park Lane, Greeneville

street address city

USA, TN, 37743, 1-616-606-0668

county state zip code telephone number

3. Defendant, Takoma Regional Hospital lives at, or its business is located at

401 Takoma Avenue, Greeneville

street address city

USA, TN, 37743

4. Statement of claim :

William B. Potter (Mr. Potter) is/was a patient of Joshua Mosley (Dr. Mosley). Dr. Mosley failed to exercise reasonable medical care including but not limited to Misreading Lab/Test Results, Unnecessary Medications, Unnecessary Cost, Lost Wages/Job, Emotional Distress, Improper Medications, Pain and Suffering, and Misdiagnoses. Dr. Mosley diagnosed Mr. Potter with Atrial Fibrillation (AFIB) based on one test an Holter Heart Monitor. Dr. Mosley also prescribed Diltiazem ER 120 MG, Xarelto 20 MG. Dr. Mosley also put Mr. Potter off of work due to said illness but was not recorded in Dr. Mosley Notes. Dr. Mosley also referred Mr. Potter to Umashankar Lakshmanadoss, MD (Dr. Laks). On Mr. Potter's first visit with Dr. Laks there was no records sent to Dr. Laks office about reasons for visiting Dr. Laks Office. Dr. Laks and Mr. Potter agreed to run another Holster Heart Test as getting test results from Dr. Mosly office would be hard. In January 2018 Mr. Potter followed up with Dr. Laks about the Holster Heart Test that was ran and Dr Laks confirmed that Mr. Potter did not suffer from AFIB and no surgery is needed. Dr. Laks also requested Mr. Potter to stop taking Diltiazem ER 120 MG Capsules as well as Xarelto 20 MG Tablets. Mr. Potter Followed Dr. Mosley's Advice and believed he suffered from AFIB and may need surgery and sought no further medical advice other than requested by Dr. Mosley. Dr. Laks Stated that Mr. Potter Suffered from sensitivity of the heart pounding to MR. Potter's recall. Due to Dr. Mosley's unreasonable medical care to Mr. Potter the unnecessary medications could have had dire side effects including but not limited to death due to age and health.

5. A demand for judgment for the relief you seek (list what you want the Court to do):

- a. Mr. Potter Seeks a settlement of the amount of \$ 750,00  
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- b. Mr. Potter Also Request to District Court of Greeneville to Double Damages  
\_\_\_\_\_
- c. \_\_\_\_\_  
\_\_\_\_\_
- d. \_\_\_\_\_  
\_\_\_\_\_

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

Signed this 28<sup>th</sup> day of Feb, 2018.

Will Potter  
510 Park Lane  
Greeneville TN 37743  
\_\_\_\_\_  
Signature of plaintiff